

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In the matter of: : CHAPTER 13
William Pastore : NO. 19-12540 JKF
:
:
_____ :

NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE

Debtor's counsel, MICHAEL A. LATZES, ESQUIRE, has filed Debtor's Motion Pursuant to 11 U.S.C. Section 506(a) and 506(d) and Bankruptcy Rule 3012 to Avoid a Wholly Unsecured Third Mortgage Lien Held by Tower Federal Credit Union, in the above captioned Chapter 13 bankruptcy case for the reason(s) listed on the enclosed motion.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.

2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the motion, then on or before **September 20, 2019**, **you or your attorney must file a response to the Motion.** (*see Instructions on next page*).

3. **A hearing on the motion is scheduled on October 16, 2019, at 9:30 a.m., in Courtroom 3, United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Philadelphia, PA 19107-4299.** Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.

4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office for Philadelphia at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

8. If you are not required to file electronically, you must file your response at:

United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

9. If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

MICHAEL A. LATZES, ESQUIRE
1528 Walnut Street, Suite 700
Philadelphia, PA 19102
(215) 545-0200 (Phone #)
(215) 545-0668 (Fax #)
efiling@mlatzes-law.com(e-mail)

[If applicable, name and address of others to be served]

Date: 9-5-19